case may be said to be consistent with the general trend of the law. The contract of conditional credit was changed when the bank honored the depositor's check. In the tender and acceptance of the check without provision for credit, the reasonable presumption would be that both parties considered this transaction as changing the ownership of the paper.

BOYCOTT—PHYSICIANS AND SURGEONS—RULES OF MEDICAL ASSOCIATION.—Defendant, British Medical Association, is an organization of medical men, its object, as stated in its memorandum of incorporation, being "To promote the medical and allied sciences, and to maintain the honor and interests of the medical profession." Plaintiff had been practicing medicine since 1895 and had been a member of the Association. In 1908 he was expelled from membership for having engaged in "contract practice", and thereupon the defendant put into operation, pursuant to its rules, a "prolonged, deliberate and pitiless boycott." This boycott or ostracism was so effective that throughout the whole period of its operation plaintiff was unable to secure the services in consultation of a single medical practitioner (with one exception) in his own community or the territory thereabouts. "His private practice was, in consequence, greatly injured, and he and the members of his family were treated as social and professional outcasts." In action for the resulting damage *held* plaintiff was entitled to recover. *Pratt* v. *British Medical Association* (1919), 1 K. B. 244.

The judgment of McCardie, J., is an able, thorough review of the authorities bearing on the problem of *Allen* v. *Flood* (1898), A. C. 1; *Quinn* v. *Leathem* (1901), A. C. 495, etc., and consideration of the principles underlying the determinations in such cases. The learned judge concludes that a threat to inflict upon a man the slur of professional dishonor was as much an "unlawful means" in injuring a person's business as is a threat to cause a strike, "each may produce intimidation." That the self interest of the defendant and its members and the alleged desire to set a particular standard of professional ethics were not a justification of what was done was deemed equally clear. The judgment concludes that malice was not an essential element in plaintiff's action, but finds that there was proof of malice. The case will be commented upon more fully in a subsequent issue of the Review.

CONSTITUTIONAL LAW—ANTI-TIPPING STATUTES.—Plaintiff was arrested for violation of the Iowa Code, Supplemental Supp. 1915, § 5028u, which provided that any employee of a hotel, barber-shop ,or other enumerated places (sic) who should accept a tip or gratuity should be guilty of a misdemeanor. The case arose on suit for a writ of habeas corpus. *Held,* the statute was unconstitutional. *Dunahoo* v. *Huber* (Iowa, 1919), 171 N. W. 123.

The court held that there was no reasonable ground whatever for distinction between employees and employers so far as concerned preclusion from accepting tips, and that, as the statute did not purport to restrict employers, it had not a "uniform operation" as required by the Iowa constitution, and did deny to employees that equal protection of the law prescribed by the federal constitution. A dissenting opinion argued that "the tipping